

BUILDING MODERNIZATION AND EXPANSION

Consumer Financial Protection Bureau Headquarters
1700 G Street, NW
Washington, DC

Finding of No Significant Impact

JAN 30 2014

Pursuant to Section 102(2)(C) of the National Environmental Policy Act, the Council on Environmental Quality Regulations (40 CFR, Parts 1500-1508), and National Capital Planning Commission's Environmental and Historic Preservation Policies and Procedures, I have evaluated the preliminary site and building plans for the modernization and expansion of the Consumer Financial Protection Bureau Headquarters at the Federal Home Loan Bank Board Building in Washington, DC, as shown on NCPC Map No. 23.00(64.20)43896; the *Environmental Assessment for the Renovation of the Consumer Financial Protection Bureau Building Located on 1700 G Street NW, Washington, DC 20552* (EA) prepared by the Consumer Financial Protection Bureau; and the Consumer Financial Protection Bureau's January 16, 2014 Finding of No Significant Impact, and I have determined that the proposal will not have a significant impact on the human environment.¹

Proposed Action

The Consumer Financial Protection Bureau (CFPB) proposes to renovate the existing Federal Home Loan Bank Board (FHLBB) Building and adjacent courtyard at 1700 G Street, NW in Washington, DC. Since construction of the building in 1975, the building has not undergone any renovations except roof maintenance, repair, and non-structural adjustments to the building interior. The proposed renovations would modernize the existing building to allow CFPB to house over 1,000 employees and contractors, consolidating two-thirds of the CFPB DC based employees to this location.

The EA analyzes a No Action Alternative and a Proposed Action Alternative to identify potential environmental impacts that could result from proposed renovations to the building and courtyard plaza. Under the No Action Alternative, there would not be any improvement to the building or plaza, however, some smaller form of interior renovations would likely occur. The Proposed Action is the alternative on which NCPC is issuing this Finding of No Significant Impact (FONSI).

The Proposed Action would involve significant improvements to the building and courtyard, including: (1) demolition of interior spaces from the basement to the sixth floor including mechanical, electrical and plumbing facilities throughout the building; (2) replacement of exterior windows and window frames throughout the building from the second to sixth floors; (3)

¹ The *Environmental Assessment for the Renovation of the Consumer Financial Protection Bureau Building Located on 1700 G Street NW, Washington, DC 20552* (December 2013) is adopted and incorporated by reference into this Finding of No Significant Impact. In this FONSI, the term "EA" refers to the December 2013 EA.

reconstruction of interior spaces using new materials; (4) addition of communication stairs from the second to sixth floors in the east and west atria; (5) addition of a communication stair from the ground floor to basement; (6) modernization of the main lobby area at the east end of the building along 17th Street; (7) replacement of mechanical, electrical, and plumbing services throughout the building; (8) addition of security features around the building perimeter to meet requirements of a Level III threat condition; (9) installation of a childcare center into a ground floor space along F Street currently occupied by a retail vendor; (10) addition of a childcare play area on top of the building fully enclosed by an eight-foot high perimeter wall; (11) reconstruction of the courtyard to include multiple levels, new planting and landscaping, and modified public seating and (12) replacement of surrounding public walkway.

Standard for evaluation

Under NEPA, the Council on Environmental Quality (CEQ) regulations, and NCPC Environmental and Historic Preservation Policies and Procedures, an environmental assessment is sufficient and an Environmental Impact Statement need not be prepared if the environmental assessment supports a finding that the federal action will not significantly affect the human environment. The regulations of the Council on Environmental Quality define "significantly" as used in NEPA as requiring consideration of both context and intensity of impacts as noted by 40 CFR §1508.27.

Potential impacts

There will be no significant environmental impacts as a result of the Proposed Action. The EA does, however, identify several areas where there will be short- and long-term minor adverse impacts caused by the Proposed Action and possible ways to mitigate these impacts. The EA also indicates that there will be beneficial impacts as a result of the Proposed Action.

The EA analyzed several environmental impact topic areas including: land use; health and safety; social and economics; perimeter security; air quality; noise; storm water; wastewater; ground water; wetlands; floodplains; threatened and endangered species; historic and archaeological resources; hazardous waste; visual resources; energy consumption; local antennas and cellular towers; vehicular traffic, pedestrian and bicycle circulation; and relationship of short-term uses vs. long-term productivity. CFPB issued a FONSI for the proposed action on January 16, 2014.

Of the environmental topic areas analyzed, NCPC's analysis of the EA focused primarily on the potential impacts to historic resources. Potential impacts and adverse effects on historic resources were considered in the EA and through Section 106 of the National Historic Preservation Act. Through the Section 106 process, CFPB and District of Columbia State Historic Preservation Officer (SHPO) determined that the FHLBB Building is eligible for listing in the National Register of Historic Places. The FHLBB Building was built in the mid-1970's, near the end of an architectural movement referred to as a mid-century Modern. The General Services Administration, Max Urbahn Associates, and Sasaki Associates designed the FHLBB Building that was at the forefront of the Contextualism movement— among Federal buildings in Washington, D.C. The development of this site came on the heels of the Modern-era Brutalist style, which populated the city's landscape with stark, hard buildings that were often designed without regard to their pre-existing surroundings. The FHLBB Building was designed to be sympathetic to the surrounding landscape and streetscape and developed to encourage a sense of community. The building color matched that of the neighboring Winder Building and was design to be sympathetic to the

Eisenhower Executive Office Building. The height and bulk of the building were monitored and designed to complement the Winder Building, not to overwhelm the surrounding existing historic buildings. The courtyard plaza (Liberty Plaza) attempted to reach out to the public and featured an ice rink which functioned as a reflecting pool in the summer. The street level was filled with shops and restaurants, and the FHLBB Building was one of the first Federal buildings to incorporate a mix of uses. Based on its architectural style as a representation of the transition in the Modern era from Brutalism and Expressionism to Contextualism in Washington, DC and its function as a model for future Federal government buildings, the FHLBB Building is eligible for the National Register of Historic Places.

During the Section 106 consultation process, CFPB and SHPO determined that the Proposed Action would have an adverse effect on the FHLBB Building because the rehabilitation and renovation work will diminish the integrity of the property by removing historic fabric and alter character-defining features of the building. Currently, CFPB, NCPC, and DCSHPO are working to finalize a Memorandum of Agreement (MOA) in order to minimize, and mitigate these adverse effects. The MOA indicates that CFPB will nominate the FHLBB Building to the DC Inventory of Historic Sites and National Register of Historic Places. In addition, mitigation will include the display and interpretation of several historic elements into the renovated FHLBB Building.

Cumulative Impacts

The EA also analyzed cumulative impacts and concluded that the proposed action would not cause any significant cumulative impacts to any of the environmental topics analyzed when considered with other past, present, and foreseeable actions.



Marcel C. Acosta
Executive Director